



# Fact Sheet

## Eli Lilly and Company, Clinton, Indiana RCRA Hazardous Waste Permit Renewal

The Indiana Department of Environmental Management (IDEM) has prepared this fact sheet to inform the public of the process involved in issuing a Hazardous Waste Management Permit.

The Solid Waste Disposal Act, commonly known as the Resource Conservation and Recovery Act (RCRA) was passed in 1976. This allowed for the regulation of the management of hazardous waste. In the State of Indiana, the IDEM is authorized by the Indiana Environmental Statutes, IC 13-22, to administer the hazardous waste permit program and related hazardous waste management requirements. Any facility which treats, stores, and/or disposes of hazardous waste in the State of Indiana is required to obtain a final hazardous waste management permit. In addition, any hazardous waste facility receiving a permit is required to provide corrective action for all releases of hazardous waste or of hazardous waste constituents from any solid waste management unit on-site.

### Facility Description

Eli Lilly and Company operates a pharmaceutical and animal products manufacturing facility in Clinton, Indiana. These processes produce waste, a portion of which is hazardous waste. This permit allows the facility to store hazardous waste in containers and tanks, and to treat hazardous waste via incineration.

### Draft Permit Conditions Summary

I. Standard Conditions: These conditions are of a general nature and are required for all facilities that manage hazardous waste under a RCRA permit.

II. General Facility Conditions: These conditions are also general in nature and required for all facilities, but are more specific in determining operating requirements.

III. Air Emission Standard Conditions: This condition addresses compliance with 40 CFR Part 264, Subpart BB, for air emissions from equipment at hazardous waste facilities.

IV. Container Storage Conditions: These conditions include waste identification, container management, secondary containment, and inspection requirements.

V. Tank Storage and Treatment Conditions: These conditions include waste identification, tank location and design, operating requirements, secondary containment, and inspection requirements.

VI. Incineration Conditions: This section addresses compliance with 40 CFR Part 264, Subpart O, including the requirement that the facility maintain compliance with the Hazardous Waste Combustor Maximum Achievable Control Technology (MACT) under the Clean Air Act.

VII. Corrective Action Conditions: These conditions provide for the investigation and remediation of any releases from a Solid Waste Management Unit (SWMU) or area of concern (AOC). These conditions also require owners and operators to provide information, including sampling, to the IDEM to support whether or not a release has occurred.

VIII. Compliance Schedule Conditions: These conditions specify a compliance schedule leading to compliance with the Indiana Hazardous Waste Rules.

## **Draft Permit Attachments**

Attachment A - Part A Application: The Part A Application details the facility location, ownership, U.S. EPA identification number, type of business, type and quantity of hazardous waste managed and the hazardous waste management practice of the facility. It is maintained on file at the IDEM and the Facility.

Attachment B - Facility Description: This attachment provides for general information of the site and surrounding land.

Attachment C - Waste Characteristics/Waste Analysis Plan: This attachment contains the Waste Analysis Plan which describes, in detail, the procedures to be used by the facility to identify the hazardous wastes to be handled on-site. The Plan includes regulatory analytical methods, procedures for physical waste identification, and procedures to ensure the proper acceptance of off-site waste.

Attachment D - Process Information: This attachment describes, in detail, the management practices the facility will utilize to ensure safe and proper storage of hazardous waste in tanks and containers.

The Plan includes tank and container handling procedures, inspection procedures and schedules, and secondary containment requirements.

Attachment E - Ground Water Monitoring: At this time, permit ground water monitoring requirements are found in Attachment J – Corrective Action.

Attachment F - Procedures to Prevent Hazards: This attachment contains the security measures and preparedness and prevention procedures to ensure the safety of the workers on-site, as well as to prevent unauthorized access. This section is closely related to the Contingency Plan and Inspection Plan.

Attachment G - Contingency Plan: The Contingency Plan describes the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or water at the facility.

Attachment H - Personnel Training: This attachment describes the training requirements for personnel working with hazardous waste at the facility.

Attachment I - Closure Plan: The Closure Plan describes, in detail, the activities and procedures that will be carried out to ensure that the hazardous waste management unit has been closed in accordance with 329 IAC 3.1. This attachment also describes the hazardous constituents of concern and the clean-up levels.

Attachment J - Corrective Action for Solid Waste Management Units: This attachment details the facility's obligation to notify the IDEM of SWMUs, and information pertaining to releases from any SWMUs. It

also describes current conditions at the facility, and how the facility will investigate each SWMU and AOC for releases of hazardous waste(s) and hazardous constituents(s).

## **Public Participation**

IDEM is conducting public participation to ensure all interested parties have an opportunity to comment on the Draft Permit. The Public Comment Period extends from May 25, 2007 through July 9, 2007. The official public notice was published on May 25, 2007 in the Daily Clintonian, Clinton, Indiana. The public notice was also broadcasted over local radio station WTHI.

All comments regarding the Draft Permit must be postmarked by July 9, 2007 (or e-mailed) and addressed to:

Paula Bansch  
IDEM  
Office of Land Quality  
100 North Senate Avenue  
Indianapolis, IN 46204  
*pbansch@idem.IN.gov*

Any interested person may request a public hearing. The request must be in writing and state the nature of the issues to be raised at the public hearing. The Commissioner shall hold a public hearing whenever it is determined, on the basis of requests, that a significant degree of public interest exists.

**To view a copy of the State Draft Permit, visit the following locations:**

IDEM File Room  
Room 1201  
100 North Senate Avenue  
Indianapolis, IN  
8:30 a.m. - 4:30 p.m.

Clinton Public Library  
313 South 4<sup>th</sup> Street  
Clinton, Indiana

Copies of the Permit Conditions and Fact Sheet may be viewed on the IDEM web site at:  
*[www.IN.gov/idem/permits/land/index.html](http://www.IN.gov/idem/permits/land/index.html)*

## **For More Information, Contact:**

Ms. Paula Bansch, IDEM  
317/232-3243 or, (800) 451-6027, press 0,  
request ext. 2-3243